

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

UNITED STATES)	
)	Case No. 3:22-cr-00327-01, 02, 05,
v.)	06, 07, 08, 09, 10, 11
)	Judge Trauger
CHESTER GALLAGHER)	Magistrate Judge Holmes
HEATHER IDONI)	
CAROLINE DAVIS)	
PAUL VAUGHN)	
DENNIS GREEN)	
EVA EDL)	
EVA ZASTROW)	
JAMES ZASTROW)	
PAUL PLACE)	

ORDER MODIFYING CONDITIONS OF RELEASE

Among the conditions of release for the co-defendants in this proceeding is a location restriction that prohibits each defendant from entering or being within a specified distance from any building or the “curtilage” of any building in which a reproductive health services (or women’s health services) facility is located without prior approval of Pretrial Services. The Court recently had occasion to consider this specific restriction in the context of pending petitions by Pretrial Services for action on conditions of release regarding certain of the defendants. Upon such further consideration, it is apparent that the term “curtilage” lends itself to differing definitions and interpretations and therefore creates the possibility of unintended noncompliance, as well as difficulty in enforcement. The Court therefore finds and concludes that clarification of the location restriction is necessary and appropriate.¹ Accordingly, pursuant to 18 U.S.C. § 3142(c)(3), the

¹ To be clear, this is not the travel restriction that limits where a defendant may travel. This is, as described, the separate and additional location restriction that prohibits each defendant from entering or being within a specified distance from any building.

Court modifies the conditions of each defendant's pretrial release by replacing the referenced existing location condition with the following:

The defendant must not enter any building in which a facility that provides reproductive health services is located, must not be within 100 feet of any entrance of any such building, and must not be in any parking lot that directly services any such building, without prior approval of Pretrial Services.

All other conditions of release previously imposed and not modified herein remain unchanged and in full force and effect.

It is SO ORDERED.



BARBARA D. HOLMES
United States Magistrate Judge